

## ACCURAY INTERNATIONAL SÁRL Anti-Slavery and Human Trafficking Statement

The UK Modern Slavery Act 2015 provides that any commercial organization in any sector that (i) supplies goods or services in the UK or carries on a business or part of a business in the UK and (ii) is above a specified total turnover must produce a slavery and human trafficking transparency statement for each financial year of the organization.

Accuray Incorporated (“**Accuray**”) publishes this statement on its corporate website in the name and on behalf of Accuray International SÁrl (the “**Company**”). This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and constitutes the Company’s slavery and human trafficking statement for the previous financial year (ending June 30, 2022).

### Our Business

Accuray International SÁrl is a private limited company incorporated in Switzerland and a wholly owned subsidiary of Accuray. The Company is part of a group of companies (collectively, the “**group**”) in which the ultimate parent company is Accuray, a publicly traded company incorporated in the State of Delaware, United States of America (“**US**”). The group is engaged in the business of radiation oncology and develops, manufactures, sells and supports precise, innovative treatment solutions that set the standard of radiation therapy care with the aim of helping patients live longer, better lives.

The Company’s business primarily comprises of sales and service of almost exclusively group products. The Company does not manufacture products itself. However, the group’s products are complex and require the integration of a number of components from several sources. Such components are manufactured by the group or contract manufacturers or are otherwise purchased by the group from third parties. The group does not purchase raw minerals from mines, smelters, or refiners and relies on its suppliers to provide components and materials that is incorporated into its products. The group manufactures its products in the US and China; however, contract manufacturers and third-party suppliers for the group are widely dispersed around the world.

### Our Policies

The Company is committed to good corporate citizenship and the highest ethical standards. To fulfill these commitments, the group has established and maintains systems and controls to safeguard against slavery and related human trafficking in the supply chain of products it purchases from suppliers, which include:

- **Code of Conduct:** Accuray’s Code of Conduct and Ethics outline the group’s expectations for business conduct and includes provisions with respect to the maintenance of high ethical and legal standards, though it does not expressly include provisions relating to the UK Modern Slavery Act because it is a document intended for the group’s employees worldwide. All UK employees are, therefore, expected to

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comply with the Code of Conduct and Ethics and are required to review the latest version annually, such review being tracked via the group's internal training tool.

- **Supplier Code of Conduct:** Accuray expects all suppliers in the group's supply chain to comply with its Supplier Code of Conduct and all applicable laws. Accuray's Supplier Code of Conduct outlines the group's expectations for suppliers and expressly includes provisions concerning child labor, slavery and human trafficking. The group's suppliers are expected to self-monitor and demonstrate their compliance with the Supplier Code of Conduct. The group also includes provisions within its supply agreements with suppliers that the supplier adhere to its Supplier Code of Conduct. The group will reserve the right to reduce or terminate its business with suppliers for violations of the Supplier Code of Conduct.
- **Human Rights Policy:** Accuray's Human Rights Policy affirms the group's commitment to respect and support US and international principles aimed at protecting and promoting human rights. The Human Rights Policy applies to all of the group's operations, direct and indirect subsidiaries, suppliers, vendors and business partners. The Human Rights Policy outlines the group's expectation regarding a variety of issues, including but not limited to forced labor, human trafficking, child labor, work hours, wages and benefits.
- **Ethics Reporting:** To manage the risk related to slavery and human trafficking, Accuray has a compliance program that includes investigating potential violations of Accuray's Code of Conduct and Ethics, Supplier Code of Conduct or Human Rights Policy and taking disciplinary actions when necessary. Accuray has a confidential hotline and website that is operated by its independent third-party reporting partner, EthicsPoint, which is available 24 hours a day, 7 days a week. EthicsPoint is available both in the US and internationally to the employees of the group and its direct suppliers. EthicsPoint may be used to report any illegal, unethical, or questionable behavior relating to Accuray's Code of Conduct and Ethics, Supplier Code of Conduct and Human Rights Policy. Such reports will be investigated under the guidance and direction of Accuray's legal and compliance departments, as appropriate. The group prohibits retaliation against any individual who raises a concern, question or complaint in good faith.

## Due Diligence

The group engages in due diligence of suppliers in its supply chain by establishing and implementing various procedures related to supplier selection, supplier classification and supply quality. Supplier oversight and monitoring procedures have also been established to monitor compliance with Accuray's policies and procedures as well as to monitor any public and news announcements related to such suppliers that may be of concern.

The group maintains the right to perform audits on suppliers, by itself or through a third party. Supplier performance is assessed through supplier review board meetings and risk assessments are performed using surveys, classification procedures and agreements with suppliers. Suppliers are monitored on identified risks and corrective action is taken with a supplier if needed.

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Although the group endeavors to have written agreements with all of its suppliers requiring them to comply with all applicable laws and the Supplier Code of Conduct, the group cannot guarantee that this is the case for all of the suppliers in its supply chain. The group treats violations of applicable law and the Supplier Code of Conduct seriously and violations may be grounds for disciplinary action, up to and including termination of contracts with its suppliers.

Accuray also publishes an annual SEC Form SD that reports the use of conflict minerals (gold, columbite-tantalite (coltan), cassiterite and wolframite, including their derivatives, which are limited to tantalum, tin and tungsten) to demonstrate due diligence in its supply chain. This due diligence process for conflict minerals also provides visibility into potential risks for slavery and human trafficking in the group's supply chains, including the Company.

## **Training**

Promoting awareness of human trafficking and modern slavery issues to employees through engagement and training will assist in identifying such issues in our supply chain. In an effort to keep employees informed about the group's principles and policies concerning ethical and legal business conduct, including as it relates to human trafficking and modern slavery, Accuray's Code of Conduct and Ethics has been made available on Accuray's website and is provided to all new employees upon hire. The group maintains internal accountability standards and procedures for both employees and contractors failing to meet company standards regarding slavery and human trafficking. In particular, the group's employees worldwide train annually on Accuray's Code of Conduct and Ethics, which includes Accuray's Human Rights Policy. Likewise, all contractors assigned to the group are required to review and abide by Accuray's Code of Conduct and Ethics.

The Company's Managing Officers approved this Anti-Slavery and Human Trafficking Statement.

Date: December 30, 2022

/s/ Ali Pervaiz  
Managing Officer